

FILED

2014 DEC -5 PM 3:12

U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

3:14 CV 267 4

WILLIAM E. JONES
2101 Walnut Street
Toledo, Ohio 43608

and

CANDACE JONES
2101 Walnut Street
Toledo, Ohio 43608

Plaintiffs

vs.

ALLSTATE PROPERTY AND
CASUALTY INSURANCE COMPANY
Allstate Plaza
Northbrook, Illinois 60062

Defendant

CASE NO.

JUDGE

JUDGE KATZ

MAGISTRATE JUDGE

MAG. JUDGE JAMES R. KNEPP II

NOTICE OF REMOVAL OF
DEFENDANT ALLSTATE PROPERTY
AND CASUALTY INSURANCE
COMPANY

**TO THE HONORABLE JUDGES OF THE UNITED STATES
DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO:**

1. Defendant Allstate Property and Casualty Insurance Company is the Defendant in a civil action brought against it in the Common Pleas Court for the State of Ohio, Lucas County, entitled "William E. Jones, et al., Plaintiffs vs. Allstate Property and Casualty Insurance Company, Defendant" being Case No. CIO201404533 on the docket of said Court. A copy of the Summons and Complaint filed in that action is attached hereto and constitutes all process, pleadings and Orders served upon Allstate

Property and Casualty Insurance Company in this action. The Complaint was filed on November 7, 2014, and the Summons is dated November 10, 2014.

2. The aforesaid action was commenced by the service of process consisting of said Summons and Complaint mailed out by the Clerk of Court on November 10, 2014 and served before November 17, 2014 upon Allstate Property and Casualty Insurance Company, so service was between those dates.

3. The controversy herein between Plaintiffs and Allstate Property and Casualty Insurance Company is a controversy between Allstate Property and Casualty Insurance Company, a citizen of the State of Illinois, and Plaintiffs, citizens of the State of Ohio.

4. At the time of the service of the relevant Summons and Complaint, Allstate Property and Casualty Insurance Company was and still is a corporation duly authorized and existing under and by virtue of the laws of the State of Illinois, with its principal place of business in the State of Illinois.

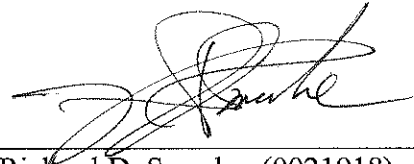
5. At the time of the service of said Summons and Complaint, Plaintiffs were and still are citizens of the State of Ohio.

6. The matter in controversy herein is alleged by Plaintiffs to exceed the sum of Seventy-five Thousand Dollars (\$75,000.00), exclusive of interest and costs, being a civil action based upon the alleged breach of contract and the tort of bad faith.

7. This is a civil action brought in a state court in which the United States District Courts have original jurisdiction because of diversity of citizenship, and Allstate Property and Casualty Insurance Company is not a citizen of the State of Ohio in

which said action was brought. Thus, this Court has original jurisdiction under 28 U.S.C. §1332(a).

WHEREFORE, Defendant Allstate Property and Casualty Insurance Company hereby gives notice that the above action now pending against it in the Court of Common Pleas of the State of Ohio in and for said County of Lucas is hereby removed therefrom to this Court.

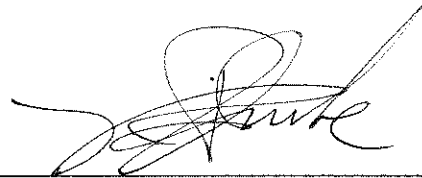


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Attorneys for Defendant

CERTIFICATE OF SERVICE

A copy of the foregoing Notice of Removal was served this 5th day of December, 2014, by first class U.S. mail, upon the following:

Chad T. Mulkey
Anne M. Izzi
Groth & Associates
416 North Erie Street, Suite 100
Toledo, Ohio 43604
Attorneys for Plaintiffs

A handwritten signature in black ink, appearing to read 'R. Sweebe', is written over a horizontal line.

Richard D. Sweebe (0021918)
Gary S. Greenlee (0067630)
Ulmer & Berne LLP
Attorneys for Defendant

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